

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**John Malone,
Debtor**

**Chapter 13
Case No. 24-10885-CJP**

**OPPOSITION BY DEBTOR TO NEWREZ LLC'S MOTION FOR RELIEF FROM
AUTOMATIC STAY**

Now come the Debtor and opposes the Motion for Relief from Automatic Stay filed by NewRez LLC. In support of this Opposition the Debtor states as follows:

1. Admitted.
2. Denied as the Plan has not been confirmed.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Neither admitted nor denied as Debtor is uncertain as to the exact amount due.
10. Admitted.
11. Admitted, but the mortgage will be paid in full from a sale of the Debtor's real estate. Debtor anticipates filing a Motion for Sale within seven days.
12. Admitted.
13. Admitted.
14. Admitted.
15. Admitted.
16. Denied as Debtor will pay mortgage in full from a sale of the Debtor's real estate. Debtor anticipates filing a Motion for Sale within seven days.

WHEREFORE, the Debtor requests the Court find as follows:

1. The Motion for Relief filed by NewRez LLC be denied.
2. For such other relief as the Court deems just.

Debtor,
By his attorney,

Dated: September 10, 2025

/s/ John Ullian
John Ullian, Esq. BBO No. 542786
Amy Puliafico, Esq. BBO No. 682332
The Law Firm of Ullian & Associates, P.C.
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Braintree, MA 02184
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CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the foregoing **OPPOSITION BY DEBTOR TO NEWREZ LLC'S MOTION FOR RELIEF FROM AUTOMATIC STAY** by ECF or by mailing a copy of same postage prepaid to the following interested parties:

Richard King
Office of the US Trustee
J.W. McCormack Post Office & Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Carolyn Bankowski
Chapter 13-12 Trustee Boston
P. O. Box 8250
Boston, MA 02114

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

NewRez LLC
Brian Kiser, Esq
Marinosci Law Group PC
275 West Natick Road, Suite 500
Warwick RI 02886

Date: September 10, 2025

/s/ John Ullian
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